

GT GreenbergTraurig

George Sullivan
 Tel 212.801.6541
 Fax 914.286.2990
 sullivan@gtlaw.com

I have reviewed the redactions.
 They fall comfortably within the class

MEMO ENDORSED

VIA ECF

Hon. Louis L. Stanton
 United States District Judge
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street
 New York, NY 10007

March 16, 2022

of material widely viewed as of no,
 or slight public concern, and entitled
 to remain private and unpublicized

The redactions are allowed.

Re: *Tara O'Connor-Roche Executor of Estate of Paul Roche III, and Individually vs.
 RBC Capital Markets, LLC, et al., No. 22-cv-01467-LLS*

Louis L. Stanton

3/21/22

Dear Judge Stanton:

We represent RBC Capital Markets, LLC and Christopher Ryan Bayles (collectively, "Respondents"). By this letter motion to seal, Respondents respectfully seek an order authorizing Respondents to redact sensitive financial information from their memorandum of law in opposition to the Petition to Vacate the Arbitration Award and in support of Respondents' cross-motion to confirm the award and supporting exhibits, filed contemporaneously herewith, and to file unredacted versions under seal.

This is Respondents' second sealing request. On March 14, 2022, this Court granted the parties' joint motion (ECF No. 7) to permit redactions of sensitive financial information reflected in exhibits to the Notice of Removal, concluding that Respondents' privacy interests outweigh the presumption in favor of public access. See Order, ECF No. 9. Here, Respondents seek to redact similar information—and in many instances, identical information—and for the same reasons. As before, Respondents seek to redact a modest amount of confidential financial information relating to the value of assets under the management of certain financial advisors, the revenue generated by those assets, and employee compensation. This information has no bearing on the narrow legal questions before the Court, and Respondents' privacy interests outweigh it.

Accordingly, Respondents hereby adopt the arguments set forth in the parties' prior joint motion (ECF No. 7) and respectfully request that the Court enter an order authorizing Respondents to make the proposed redactions and to file unredacted versions under seal.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/22/22

Respectfully submitted,

/s/ George D. Sullivan
George D. Sullivan
Greenberg Traurig, LLP
One Vanderbilt Avenue
New York, NY 10017
Tel: 212.801.6541
Fax: 212.224.6104

Attorneys for Respondents